

# *The E-rate Program*

## **Correcting Ministerial & Clerical Errors** Fall 2011 Applicant Trainings

## Overview

- M&C errors
  - What are M&C errors
  - What is new & what is the same
- Corrections
  - Allowable
  - Non-allowable
  - Conditional
- Submitting Corrections to USAC
- Notifications from USAC (FCDL Comments)

## *Correcting M&C Errors*

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# **Ministerial & Clerical Errors**

# Ministerial & Clerical Errors

## Definition

- “The applicant can amend its forms to correct clerical and ministerial errors on their [FCC Forms 470](#), [FCC Form 471 applications](#), or [associated documentation](#) until an FCDL is issued. Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error.”(FCC 11-60)

# Ministerial & Clerical Errors

## Ann Arbor Order (10-2354) M&C Examples

- “Specifically, we find that the petitioners inadvertently made ministerial or clerical errors while completing their FCC forms, while responding to USAC requests for additional information during the application review process, or while making requests for service substitution. These errors include: failing to timely notify USAC to correct a USAC clerical error, entering the wrong FCC Form 470 number, wrong billed entity number, or wrong billed entity number/worksheet number on their FCC Form 471; entering the wrong name or service provider identification number (SPIN); entering the wrong expiration date for a contract; erroneously characterizing the purchase and installation of equipment as a recurring service; entering the monthly charge as the annual charge; entering the discounted annual price rather than the pre-discount annual price; entering the amount that a service provider was mistakenly temporarily charging rather than the contracted monthly rate; miscalculating its discount rate; failing to separately list a building where equipment was to be located; failing to enter a request for telecommunications service that was clearly indicated on its item 21 attachment; basing its block 5 funding requests on the wrong FCC Form 471 block 4 worksheet; selecting the wrong term or service; selecting the wrong category of service in its FCC Form 471; making a typographical error in recording the cost of ineligible equipment in response to a USAC request for additional data; failing to follow the correct procedure for modifying its FCC Form 471; mistakenly providing the wrong documentation concerning a purchase; and describing the service it purchased as for its entire district when it was only intended to serve a single elementary school. In addition, one applicant omitted a service from a service substitution request, and another entered the wrong application number on the certifications it submitted and apparently failed to press the submit button to submit its otherwise completed application.”

# Ministerial & Clerical Errors

## What Is New?

- 15 Day Rule eliminated (CORRECTIONS ONLY)
  - RNL & RAL corrections can be submitted until the FCDL is issued
- PIA will ask if this is a ministerial or clerical error
  - Tell us what error occurred
  - Provide a reasonable explanation
  - Documentation may be requested

## What Is The Same?

- Minimum Processing Standards (MPS) for the FCC Forms 470 & 471 and Certifications
- FCC Forms 470 & 471 and Certifications corrections
- FCC Form 471 Certification must be submitted on or before the Window close
- 15 Day Rule still applies for responses to reviewers' inquiries
- Additional documentation may be required to support your requested change

## M&C Errors Examples

- Spelling errors
- Simple addition, subtraction, multiplication or division errors
- Transposed letters and/or numbers
- Misplaced decimal points
- Other punctuation marks (hyphens, periods, commas, etc.) included, or not included or misplaced
- Failing to enter an item from the source list (e.g., NSLP data, uploading Block 4 data, FRN, etc.)

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# **Allowable Corrections**

## FCC Form 470 Allowable Corrections

- Update or change contact person and/or consultant information
- Billed entity information
- Add the authorized person signature
- Change or update eligible entities receiving service  
*(Note: changes are accepted if it is not a significant change from the original scope)*
- Certification not submitted by Window close

## FCC Form 471 Allowable Corrections

- Incorrect citation such as:
  - FCC Form 470 number
  - Discount percent
  - Urban/rural status
  - Contract number
  - Billing Account Number/Multiple Billing Account Numbers
  - Block 4 worksheet entries

## FCC Form 471 Allowable Corrections Cont'd

- Update or change contact person and/or consultant information
- Correct errors to dollars figures on an FRN
- Add or remove entities accidentally omitted or included in block 4
- Provide accidentally omitted FRNs
- Amount budgeted for ineligible services (Block 6)

# Ministerial & Clerical Errors

## Conditional Corrections

- SPIN corrections are ALLOWABLE when requesting a Corrective SPIN change
  - Data entry errors, company merger or acquisition
- Contract Award Date/ Expiration Date
- Consortium Letters of Agency (LOA)
  - Applicants may provide supplemental documentation dated on or before FCC Form 471 certification postmark date when:
    - LOA service timeframe is missing or not specified
    - Lack of detail regarding the services provided
    - Missing consortium members

## *Correcting M&C Errors*

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# **Non-Allowable Corrections**

# Ministerial & Clerical Errors

## Non-Allowable Corrections

- FCC Form 470: Adding Service Category
  - Must post new FCC Form 470
- FCC Form 471: Operational SPIN change
  - Request SPIN change after FCDL issued

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# **Correcting Errors**

## Submitting Corrections

- FCC Form 470 corrections submitted via Receipt Notification Letter (RNL)
- FCC Form 471 corrections submitted via Receipt Acknowledgement Letter (RAL) and/or during FCC Form 471 review
- Follow submission instructions on letter

## Program Integrity Assurance (PIA) Review

- Discrepancies may be detected during PIA review. PIA will contact you when PIA is unsure an error happened.
  - PIA will:
    - ask if an error occurred
    - ask if you wish to make a correction
    - ask for an explanation
    - request supporting documentation, if applicable

## Program Integrity Assurance (PIA) Review

- Supporting documentation examples:
  - Contract, Service Agreement
  - Vendor quote, bill, invoice, etc.
  - Documented communication like emails between the applicant & the service provider
  - Source list
  - RFP, Newspaper listing
  - NSLP documentation or student enrollment data
  - Board Minutes, Resolutions
  - Budget

## Correction Notification

- PIA Review
  - Your reviewer will inform you if the correction was completed or not (preferred mode of contact)
- FCDL
  - Global Comment
    - informs applicant that a RAL correction was received
    - Informs the applicant about corrections affecting multiple FRNs (e.g., discounts, entity removals)
    - appears at the top of the FCDL FRN report
  - FRN Comment: states the specific changes

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# **Questions?**

# Thank you!